

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

AMERICAN PATENTS LLC,

Plaintiff,

v.

SEIKO EPSON CORPORATION and
EPSON PRECISION PHILIPPINES, INC.,

Defendants.

CIVIL ACTION NO. 4:21-cv-718-ALM

JURY TRIAL DEMANDED

JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Defendants Seiko Epson Corporation (“Seiko Japan”) and Epson Precision Philippines, Inc. (“Epson Philippines”) (Seiko Japan and Epson Philippines are referred to collectively as “the Epson Defendants”) and Plaintiff American Patents LLC (“American”) hereby submit this Joint Motion To Stay All Deadlines and Notice of Settlement and respectfully show the Court as follows:

- (1) American and the Epson Defendants have reached a settlement in principle resolving all matters in controversy between American and the Epson Defendants in the above-referenced action and are in the process of finalizing the settlement.
- (2) Accordingly, American and the Epson Defendants submit that the Court’s resources would best be served by a stay of all unreached deadlines for a period of forty-five (45) days so that the announced settlement in principle may be completed and appropriate dismissal papers thereafter filed with the Court.

WHEREFORE, American and the Epson Defendants request the Court grant this Joint Motion To Stay All Deadlines and Notice of Settlement and enter an Order granting a temporary stay of all upcoming deadlines for a period of forty-five (45) days.

Dated: March 25, 2022

Respectfully submitted,
/s/ Zachariah S. Harrington
Matthew J. Antonelli
Texas Bar No. 24068432
matt@ahtlawfirm.com
Zachariah S. Harrington
Texas Bar No. 24057886
zac@ahtlawfirm.com
Larry D. Thompson, Jr.
Texas Bar No. 24051428
larry@ahtlawfirm.com
Christopher Ryan Pinckney
Texas Bar No. 24067819
ryan@ahtlawfirm.com

ANTONELLI, HARRINGTON
& THOMPSON LLP
4306 Yoakum Blvd., Ste. 450
Houston, TX 77006
(713) 581-3000

Stafford Davis
State Bar No. 24054605
sdavis@stafforddavisfirm.com
Catherine Bartles
Texas Bar No. 24104849
cbartles@stafforddavisfirm.com
THE STAFFORD DAVIS FIRM, PC
815 South Broadway Avenue
Tyler, Texas 75701
(903) 593-7000

Attorneys for American Patents LLC

/s/ Matthew J. Hertko

Keith B. Davis

Texas State Bar No. 24037895

JONES DAY

2727 North Harwood Street

Suite 500

Dallas, Texas 75201-1515

(214) 220-3939 Phone

(214) 969-5100 Fax

kbdavis@jonesday.com

William E. Devitt

Matthew J. Hertko

JONES DAY

77 W. Wacker Drive

Suite 3500

Chicago, Illinois 60601

(312) 782-3939 Phone

(312) 782-8585 Fax

wdevitt@jonesday.com

mhertko@jonesday.com

ATTORNEYS FOR DEFENDANTS SEIKO

EPSON CORPORATION AND EPSON

PRECISION PHILIPPINES, INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on March 25, 2022.

/s/Zachariah S. Harrington
Zachariah S. Harrington